

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) JANELLE BRIDGES,)
individually and as the surviving)
spouse of SHANE ALLEN BRIDGES,)
deceased, and as the Mother and)
Next Friend of,)
(2) A.B., a minor child,)
(3) B.B., a minor child,)
(4) S.B., a minor child,)
(5) A.C., a minor child,)
(6) J.S., a minor child,)
(7) J.H., a minor child,)



Plaintiffs,)

-vs-)

No. 15-CV-126-GKF-PJC)

(1) KYLE WILSON, in his)
individual and official capacity,)
(2) MIKE REED, in his individual)
and official capacity,)
(3) MAYES COUNTY,)

Defendants.)

* * * * *
DEPOSITION OF REX DALE COWAN
TAKEN ON BEHALF OF THE DEFENDANTS
AT THE MAYES COUNTY COURTHOUSE
PRYOR, OKLAHOMA
ON JULY 28, 2016
COMMENCING AT 3:51 P.M.
* * * * *

REPORTED BY: BETH A. MCGINLEY, CSR, RPR

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Rex Dale Cowan
7/28/2016

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OKLAHOMA

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1 REX DALE COWAN,
2 having been duly sworn, testified as follows:

3 * * * * *

4 EXAMINATION

5 BY MR. GEE:

6 Q State your full name for the record, please.

7 A Rex Dale Cowan.

8 Q Okay. And what's your address, Mr. Cowan?

9 A [REDACTED]

10 Q And --

11 A Chelsea, Oklahoma.

12 Q And what's the Chelsea zip code?

13 A 74016.

14 Q And what's a good telephone number for you?

15 A (918) [REDACTED]

16 Q And have you ever been deposed before? Have you
17 ever given a deposition?

18 A Yes.

19 Q Okay.

20 A Yes.

21 Q What matter was that in?

22 A That was in a workman's comp case.

23 Q Was it one that you filed or one that someone
24 had filed and --

25 A I filed.

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1 Q All right.

2 A Uh-huh.

3 Q And through Diamond Head or before Diamond Head,
4 have you received any kind of medical training?

5 A Not before, no.

6 Q Okay.

7 A Through Diamond Head, yes.

8 Q Through Diamond Head --

9 A Uh-huh.

10 Q -- what kind of training did you receive?

11 A Just EMR, emergency medical responder training.

12 Q So, I mean, first aid, CPR --

13 A Yes.

14 Q -- and a little higher, even, than that?

15 A Yeah.

16 Q Okay. And -- but, I mean, you don't have, like,
17 a college degree in it or anything?

18 A Oh, no.

19 Q Okay. How about any kind of law enforcement
20 training?

21 A No.

22 Q Crime scene reconstruction training, anything
23 like that?

24 A No.

25 Q Okay. Any kind of ballistics training?

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1 A No.

2 Q Okay. Before January 1st, 2015, did you know
3 Shane and Janelle Bridges?

4 A Yes.

5 Q Okay. How did you know them?

6 A Just as a neighbor.

7 Q Okay. How many times had you had contact with
8 them?

9 A Very little.

10 Q Okay. Do -- do you remember the night of the
11 incident involving Shane Bridges?

12 A Yes.

13 Q Do you remember what date that was?

14 A I believe it was January 1 of 2014.

15 Q Okay. And can you walk me -- let me back up.

16 How many times did you say you had made contact
17 with Shane or Janelle?

18 A Very few.

19 Q Okay.

20 A Yeah.

21 Q In the -- the times that you had made contact
22 with them, respective -- were they respectful?

23 A Oh, yeah.

24 Q Everything went well?

25 A Yeah --

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1 A Yes.

2 Q More than 15?

3 A There was a bunch.

4 Q Okay.

5 A Yeah.

6 Q Would you estimate around 15?

7 A Probably, yes.

8 Q Okay.

9 A I mean, I don't know. I -- I couldn't count
10 them. I -- I can't count them.

11 Q I understand.

12 A Yeah.

13 Q As far as the succession of those rounds, do you
14 recall, kind of, the order in which they went?

15 A Just start to finish.

16 Q Okay.

17 A Boom, boom, boom, boom, boom, boom, boom.

18 Q Could you tell what kind of gun was being shot?

19 A No.

20 Q Could you tell whether there was multiple guns
21 being shot?

22 A No.

23 Q You just couldn't tell, one way or the other?

24 A Just sounded like someone started shooting and,
25 you know, boom.

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1 were 15?

2 A Yeah.

3 Q Had you shot, in some manner, every month since
4 then or --

5 A No. No, probably a couple times a year.

6 Q Couple times a year?

7 A Uh-huh.

8 Q Okay. Out on your property, there appears to be
9 plenty of room to shoot out there. Do you --

10 A Yes.

11 Q Do you shoot out there now?

12 A Yes.

13 Q Okay. I assume you own a semiautomatic?
14 Pistol? Do --

15 A Handgun.

16 Q -- you own a semiau- --

17 A Yes.

18 Q A semiautomatic pistol?

19 A Uh-huh.

20 Q Okay. And have you ever unloaded a clip, from a
21 semiautomatic, as fast as you could?

22 A Yes.

23 Q Okay. Now, let me ask you this: The shots you
24 heard at around 1:30 the night in question, did that sound
25 like a semiautomatic being unloaded?

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1 A Yes.

2 Q Did all the shots sound like it came from the
3 same gun?

4 MR. GEE: Object to the form.

5 Q (By Mr. Norwood) You can go ahead and answer.

6 MR. GEE: Yeah.

7 A Yes.

8 Q (By Mr. Norwood) Okay. I now want to take you
9 to the scene. You're at the scene, you've gone in, you've
10 checked Shane, and you turned the scene over to the
11 ambulance. You're standing outside, and it sounds like
12 you were standing out there for a couple hours observing
13 the scene?

14 A Yes.

15 Q Now, I want to show you -- it's been marked as
16 Defendants' Exhibit 7. The second picture in the group
17 there -- it's two pictures. The second group in the
18 picture there. And I want to direct your attention to the
19 circle, which would be the house Shane and Janelle was
20 living in?

21 A Yes.

22 Q You know, that's not a close-up picture, I don't
23 think.

24 You come up the driveway, the long driveway, and
25 then am I correct that there's a little driveway, jutting

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1 testimony?

2 A Yes.

3 Q Okay. And then, earlier, you -- and it's my
4 understanding you've testified that you can't tell what
5 kind of guns, or gun, the shots came out of, right?

6 A Correct.

7 Q And so you don't have any idea as to whether it
8 was one gun, two guns, three guns or four guns?

9 A No.

10 Q Is that fair?

11 A Yes.

12 Q Let me ask that again. Do you know how many
13 guns were shot that night at 1:30?

14 A No.

15 Q Okay. And, earlier, I think you responded that
16 you thought that they might have been all shot from the
17 same gun?

18 A (Moved head up and down).

19 Q And is it just as true that they could have been
20 shot from two guns?

21 A Rephrase.

22 Q Okay. Do you have any idea -- any idea -- the
23 shots that you heard around 1:30, on the morning of
24 January 1st, 2014, how many guns were being shot at that
25 time?

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1 A One.

2 Q How do you know that?

3 A It just sounded that way.

4 Q Okay. And do you have any specialized training
5 in recognizing --

6 A No.

7 Q And let me go ahead and finish.

8 Do you have any special training in recognizing
9 gunshots?

10 A No.

11 Q Or the direction in which they're fired?

12 A No.

13 Q Or being able to identify what guns are being
14 fired?

15 A No.

16 Q So, just based on your experience, you think
17 that there was probably one -- one gun being shot?

18 A Yes.

19 Q But if someone were to say that there were two
20 guns being shot, would you dispute that?

21 MR. NORWOOD: Objection.

22 A Yes.

23 Q (By Mr. Gee) Why would you dispute that?

24 A There is a gun range behind my house. Not on my
25 property, but there's a gun range behind my house. They

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1 testifying, right?

2 A Yes.

3 Q And -- but what I'm saying is, is could it have
4 been two guns?

5 MR. NORWOOD: Objection.

6 A I don't know.

7 Q (By Mr. Gee) Did you see any kind of muzzle
8 flash or anything like that?

9 A No.

10 Q Okay. So, in regards to whether it was one gun
11 or two guns, it's -- you're solely going off the sound?

12 MR. NORWOOD: Objection.

13 A Yes.

14 MR. GEE: What was wrong with that question?

15 MR. SICKING: Asked and answered.

16 MR. NORWOOD: It's been asked -- it has been
17 asked and answered, like, three times.

18 MR. GEE: Okay.

19 MR. NORWOOD: But all those objections are
20 irrelevant because we're not -- we're reserving those
21 right now. I just had a problem with the form of it.

22 MR. GEE: Okay. Well, that's what I'm asking.
23 I'm asking for the issue of the form.

24 MR. NORWOOD: Yeah.

25 MR. GEE: And so you're saying it's -- it's just